

DANIEL G. BOGDEN
United States Attorney
District of Nevada
BLAINE T. WELSH
Assistant United States Attorney
Nevada Bar. No. 4790
333 Las Vegas Boulevard South, Suite 5000
Las Vegas, Nevada 89101
Phone: (702) 388-6336
Facsimile: (702) 388-6787
Email: Blaine.Welsh@usdoj.gov

WILLARD K. TOM
General Counsel
NIKHIL SINGHVI
JASON D. SCHALL
JULIE G. BUSH
HELEN P. WONG
Federal Trade Commission
600 Pennsylvania Avenue, NW
Mailstop NJ-3158
Washington, D.C. 20580
Phone: (202) 326-3480 (Singhvi)
Facsimile: (202) 326-3629
Email: nsinghvi@ftc.gov; jschall@ftc.gov;
jbush@ftc.gov; hwong@ftc.gov

(additional counsel listed on signature page)

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

AMG Services, Inc. et al.,

Defendants, and

Park 269 LLC, et al.,

Relief Defendants.

Case No. 2:12-cv-536

**STIPULATION AND
PROPOSED ORDER TO
DISMISS
PARTNERWEEKLY,
LLC WITHOUT
PREJUDICE**

1 Pursuant to L.R. 7-1, Plaintiff Federal Trade Commission (“FTC”) and Defendant
2 PartnerWeekly, LLC (“PartnerWeekly”) hereby submit this stipulation and proposed
3 order.

4 1. The FTC moves to dismiss PartnerWeekly from this case, without
5 prejudice.

6 2. PartnerWeekly shall continue to preserve documents related to this action
7 at least until such time as (i) the FTC and PartnerWeekly agree in good faith that
8 PartnerWeekly has completed its response to any FTC subpoena to PartnerWeekly
9 related to this action, or (ii) the action is concluded, whichever is sooner.
10

11 3. PartnerWeekly waives any claim it may have held under the Equal Access
12 to Justice Act, 28 U.S.C. § 2412, concerning the prosecution of this action to the date of
13 this Stipulation. Each party shall bear its own costs and attorneys’ fees.

14 4. This stipulation applies only to defendant PartnerWeekly.
15
16
17
18
19
20
21
22
23
24
25
26
27

1 WHEREFORE, the FTC and PartnerWeekly jointly request an order dismissing
2 PartnerWeekly from this case, without prejudice.

3
4 DATED this 11th day of July, 2012.

5 McDONALD CARANO WILSON LLP

6 /s/ Andrew P. Gordon

7 Andrew P. Gordon (NSBN 3421)
8 2300 West Sahara Avenue, Suite 1000
9 Las Vegas, NV 89102
10 Telephone Number: (702) 873-4100
11 Facsimile Number: (702) 873-9966
12 agordon@mcdonaldcarano.com

13 *Attorney for PartnerWeekly, LLC*

DATED this 11th day of July, 2012.

WILLARD K. TOM
General Counsel

/s/ Nikhil Singhvi

Nikhil Singhvi
Julie G. Bush
Jason D. Schall
Helen P. Wong

*Attorneys for Plaintiff
Federal Trade Commission*

14
15 **ORDER**

16 IT IS SO ORDERED:

17 
18 UNITED STATES DISTRICT JUDGE

19 Dated: July 11, 2012
20
21
22
23
24
25
26
27

CERTIFICATE OF SERVICE

I, Nikhil Singhvi, certify that the following individuals were served with the **STIPULATION AND PROPOSED ORDER TO DISMISS PARTNERWEEKLY, LLC WITHOUT PREJUDICE** by the method indicated below:

Electronic Case Filing:

David J. Merrill (david@djmerrillpc.com),
Adam S. Hoffinger (ahoffinger@mofo.com)
Andrew MacGregor Smith (asmith@mofo.com)
Nicholas Miranda (nmiranda@mofo.com)
Bradley S. Lui (blui@mofo.com)
Conly J. Schulte (cschulte@ndnlaw.com)
Francis J. Nyhan (jnyhan@ndnlaw.com)
*Attorneys for Defendants AMG Services, Inc.; Red Cedar Services, Inc. dba
500FastCash; SFS, Inc. dba OneClickCash; Tribal Financial Services, dba Ameriloan,
UnitedCashLoans, USFastCash, and Miami Nation Enterprises*

Von S. Heinz (vheinz@lrlaw.com)
Darren J. Lemieux (dlemieux@lrlaw.com)
E. Leif Reid (lreid@lrlaw.com)
Jeffrey D. Morris (jmorris@berkowitzoliver.com)
Ryan C. Hudson (rhudson@berkowitzoliver.com)
Nick J. Kurt (nkurt@berkowitzoliver.com)
*Attorneys for Defendants AMG Capital Management, LLC; Level 5 Motorsports, LLC;
LeadFlash Consulting, LLC; Black Creek Capital Corporation; Broadmoor Capital
Partners, LLC; Scott A. Tucker; Blaine A. Tucker*

Andrew P. Gordon (agordon@mcdonaldcarano.com)
Attorney for Defendant PartnerWeekly, LLC

L. Christopher Rose (lcr@juww.com)
Attorney for Defendants The Muir Law Firm, LLC and Timothy J. Muir

Jay Young (jay@maclaw.com)
Attorney Defendant for Robert D. Campbell

Paul C. Ray (paulcraylaw@aol.com)
Attorney for Defendant Troy L. LittleAxe

Patrick J. Reilly (preilly@hollandhart.com)
Attorney for Defendants Kim C. Tucker and Park 269 LLC

1 Brian R. Reeve (breeve@swlaw.com)
2 Nathan F. Garrett (ngarrett@gbmglaw.com)
3 Whitney P. Strack (pstrack@gbmglaw.com)
4 *Attorneys for Defendant Don E. Brady*

5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
Dated this 11th day of July 2012.

/s/ Nikhil Singhvi

Nikhil Singhvi